

The Honorable Kymberly K. Evanson

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SHENZHEN ROOT TECHNOLOGY
CO., LTD., et al.,

Plaintiffs,

v.

CHIARO TECHNOLOGY LTD.,

Defendant.

No. 2:23-cv-00631-KKE

**[PROPOSED] ORDER GRANTING
MOTION TO CONTINUE PRE-
TRIAL DEADLINES AND STRIKE
TRIAL DATE**

CHIARO TECHNOLOGY LTD.,

Counterclaim Plaintiff,

v.

SHENZHEN ROOT TECHNOLOGY
CO., LTD., et al.,

Counterclaim Defendants.

THIS MATTER comes before the Court on the Motion to Continue Pre-Trial Deadlines and Strike Trial Date filed by Plaintiffs/Counterclaim Defendants Shenzhen Root Technology Co., Ltd. (aka Shenzhen Lutejiacheng Network Technology Co., Ltd.), Hong Kong Lute Technology Co., Limited, Shenzhen Conglin E-Commerce Co., Ltd, Shenzhen Jinruihang Technoogy Co, Ltd., and Shenzhen Xitao Network Technology Co., Ltd.

(collectively, “Momcozy”). Having considered Momcozy’s Motion, the Response filed by Defendant/Counterclaim Plaintiff Chiaro Technology Ltd. (“Elvie”), and the Reply filed by Momcozy, the Court GRANTS Momcozy’s Motion as follows:

The Court STRIKES the trial date and all post-claim construction pre-trial deadlines. The Court SETS the following pre-claim construction deadlines:

| Pre-Claim Construction Deadline | Proposed Modification |
|---|------------------------------|
| JURY TRIAL DATE | To be set by the Court |
| Preliminary Infringement Contentions and Disclosure of Asserted Claims (LPR 120) | August 1, 2024 |
| Disclosure of Preliminary Non-Infringement and Invalidity Contentions (LPR 121) | September 5, 2024 |
| Exchange of Proposed Terms and Claim Elements for Construction (LPR 130(a)) | September 26, 2024 |
| Exchange of Preliminary Claim Constructions and Extrinsic Evidence (LPR 131(a), LPR 131(b)) | October 25, 2024 |
| Joint Claim Construction and Prehearing Statement (LPR 132) | December 11, 2024 |
| Opening Expert Disclosures for Claim Construction (LPR 132(f)) | December 11, 2024 |
| Rebuttal Expert Disclosures for Claim Construction | January 10, 2025 |
| Completion of Claim Construction Discovery | February 6, 2025 |
| Opening Claim Construction Briefs (LPR 134(a)) | February 13, 2025 |
| Responsive Claim Construction Briefs (LPR 134(c)) | February 28, 2025 |
| Claim Construction Hearing (LPR 135) | To be set by the Court |

Following issuance of the Court's claim construction order, the Court will re-set the trial date and all other pre-trial deadlines.

DATED this ____ day of _____, 2024.

Hon. Kymberly K. Evanson
United States District Judge

Presented by:

ARETE LAW GROUP PLLC

By: /s/ Jeremy Roller
Jeremy E. Roller, WSBA No. 32021
1218 Third Avenue, Suite 2100
Seattle, WA 98101
Phone: (206) 428-3250
Fax: (206) 428-3251
jroller@aretelaw.com

SHM LAW FIRM

By: /s/ Qianwu Yang
Qianwu Yang (admitted *pro hac vice*)
Xiaomin Cao (admitted *pro hac vice*)
3000 El Camino Real
Building 4, Suite 200
Palo Alto, CA 94306
Phone: +86 139 2521 2009
Fax: +86 755 8326 6693
yang@shm.law
cao.xiaomin@shm.law

*Attorneys for Shenzhen Root Technology
Co., Ltd., Hong Kong Lute Technology Co.,
Limited, Shenzhen Conglin E-Commerce
Co., Ltd, and Shenzhen Jinruihang Technology
Co., Ltd.*

CERTIFICATE OF SERVICE

I hereby certify that on this date I caused true and correct copies of the foregoing document to be served upon all attorneys of record using the automatic notification generated by the CM/ECF system.

Dated this 4th day of June, 2024, in Seattle, Washington.

/s/ Kaila Greenberg

Kaila Greenberg
Legal Assistant